

**MUR # 7013**

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2016 FEB 19 PM 3:01

In the matter of:

IGX LLC  
Andrew Duncan  
Conservative Solutions PAC  
Nancy H. Watkins, as treasurer, Conservative Solutions PAC

OFFICE OF GENERAL  
COUNSEL  
MUR \_\_\_\_\_

### COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Noah Bookbinder bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against IGX LLC, Andrew Duncan, Conservative Solutions PAC, and its treasurer, Nancy H. Watkins, for direct and serious violations of the Federal Election Campaign Act ("FECA").

#### Summary

2. On October 26, 2015, IGX LLC made a \$500,000 contribution to Conservative Solutions PAC, a super PAC supporting Marco Rubio's presidential campaign. Andrew Duncan, who identified himself as the CEO of IGX LLC, later admitted he was the source of the contribution and used IGX LLC to hide that fact. As a result, IGX LLC's contribution appears to have been made in the name another in violation of the FECA and FEC regulations.

3. Furthermore, if Conservative Solutions PAC knew the contribution was made in the name of another, it likely violated the law as well.

### Complainants

4. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

5. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and those who make expenditures to influence federal elections, and publicizes those who violate federal campaign finance laws through its website, press releases, and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violations and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

6. In order to assess whether an individual or entity is complying with federal campaign finance law, CREW needs the information contained in disclosure reports political committees must file pursuant to the FECA, 52 U.S.C. §§ 30104(a), (b); 11 C.F.R. §§ 104.1, 104.3. CREW is hindered in its programmatic activity when an individual or entity fails to disclose campaign finance information in reports required by the FECA.

1800444-792

7. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual or entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

8. Complainant Noah Bookbinder is the executive director of Citizens for Responsibility and Ethics in Washington. At all times relevant to the complaint, he has been and remains a citizen of the United States and a registered voter and resident of Maryland. As a registered voter, Mr. Bookbinder is entitled to receive information contained in disclosure reports required by the FECA, 52 U.S.C. § 30104; 11 C.F.R. §§ 104.1, 104.3. Mr. Bookbinder is harmed when an individual, candidate, political committee, or other entity fails to report campaign finance activity as required by the FECA. *See FEC v. Akins*, 524 U.S. 11, 19 (1998), quoting *Buckley v. Valeo*, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Mr. Bookbinder is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting his ability to review campaign finance information.

Respondents

9. IGX LLC is a limited liability company organized and registered in Delaware. Delaware Department of State, Division of Corporations, Entity Details for IGX LLC (attached

as Exhibit A). IGX LLC was formed and/or incorporated on May 13, 2015. *Id.* It is not known if IGX LLC conducts any business or has generated any income.

10. Andrew Duncan is a resident of Brooklyn, NY. Jack Gillum, Chad Day, and Stephen Braun, Big Bucks, Shadowy Companies: Election Mystery Money Returns, Associated Press, February 3, 2016 (attached as Exhibit B). Mr. Duncan identified himself as the CEO of IGX LLC in making a \$2,700 contribution to Sen. Marco Rubio's presidential campaign committee. Marco Rubio for President, FEC Form 3P, October 2015 Quarterly Report, Amended, at 736 (October 30, 2015) (excerpts attached as Exhibit C).

11. Conservative Solutions PAC is an independent expenditure-only committee ("super PAC") established on February 4, 2013. Conservative Solutions PAC, FEC Form 1, Statement of Organization (February 4, 2013) (excerpts attached as Exhibit D). According to Conservative Solutions PAC, supporters of Sen. Rubio formed the super PAC "to support his campaign for president in 2016." Conservative Solutions PAC website, "About" page (available at <http://conservativesolutionspac.com/about/>).

12. Nancy H. Watkins is treasurer of Conservative Solutions PAC. Exhibit D.

#### Factual Allegations

13. On October 26, 2015, IGX LLC made a \$500,000 contribution to Conservative Solutions PAC. Conservative Solutions PAC, FEC Form 3X, 2015 Year-End Report, at 26 (January 31, 2016) (excerpts attached as Exhibit E).

14. Conservative Solutions PAC's disclosure report provides little information about IGX LLC. The only information provided is that IGX LLC's address is 2711 Centerville Road, Suite 400, Wilmington, DE 19808. *Id.* That is the same address as provided by IGX LLC on its

Delaware registration. Exhibit A. As the registration indicates, that is the address of IGX LLC's registered agent, the Corporation Service Company, *id.*, "masking [its] true ownership on state incorporation documents." Julie Bykowicz and Chad Day, Presidential Super PACs Lost Steam in the Second Half of 2015, *Associated Press*, January 31, 2016 (attached as Exhibit F).

15. This contribution, and the lack of information about who ultimately paid for it and others like it, has led to questions about "mystery money" and "untraceable money" funding groups supporting presidential candidates. *See, e.g.*, Gillum, Day, and Braun, *Associated Press*, February 3, 2016; Paul Blumenthal, Hedge Fund Billionaires and Untraceable Money Fill Rubio Super PAC Coffers, *Huffington Post*, January 31, 2016 (attached as Exhibit G).

16. Despite IGX LLC's efforts to conceal information about itself, as Mr. Duncan admitted, he is the source of IGX LLC's contribution to Conservative Solutions PAC. Mr. Duncan revealed his connection to IGX LLC by identifying himself as the company's CEO in connection with his contribution to Sen. Rubio's presidential campaign committee.

17. Mr. Duncan then acknowledged to the *Associated Press* that "he was the source of the super PAC donation." Gillum, Day, and Braun, *Associated Press*, February 3, 2016. Mr. Duncan further admitted he intentionally used IGX LLC to hide the fact that he was the source of the contribution. Mr. Duncan funds human rights efforts in China, and told the *Associated Press* he "had used IGX to mask the donation because he was worried about reprisals." *Id.*

18. In addition to his contribution to Conservative Solutions PAC, Mr. Duncan also helped host a fundraiser in October 2015 for Sen. Rubio's campaign committee and is listed on Sen. Rubio's campaign website as having pledged to "buy Marco a plane ticket." Fundraiser

Invitation for Marco Rubio for President (attached as Exhibit H); Marco Rubio for President website, "Sponsors" page (attached as Exhibit I).

Count I

19. The FECA and FEC regulations prohibit making a contribution in the name of another person and knowingly permitting one's name to be used to effect a contribution in the name of another person. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b).

20. Mr. Duncan appears to have made a \$500,000 contribution to Conservative Solutions PAC in the name of IGX LLC in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Mr. Duncan admitted both that he was the source of the \$500,000 contribution IGX LLC made to Conservative Solutions PAC and that he used IGX LLC to mask the fact that he was the source of the contribution. In addition, IGX LLC may not conduct any business or generate any income.

21. IGX LLC appears to have correspondingly violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b) by knowingly permitting its name to be used to effect a \$500,000 contribution by Mr. Duncan to Conservative Solutions PAC.

22. If these violations were knowing and willful, as Mr. Duncan appears to have admitted, they are subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

Count II

23. The FECA and FEC regulations also prohibit knowingly accepting a contribution made by one person in the name of another person. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b).

24. If Conservative Solutions PAC and Ms. Watkins knowingly accepted a contribution made by Mr. Duncan in the name of Conservative Solutions PAC, they may have violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b).

Conclusion

WHEREFORE, Citizens for Responsibility and Ethics in Washington and Noah Bookbinder request that the FEC conduct an investigation into these allegations, declare the respondents to have violated the FECA and applicable FEC regulations, and order respondents to correct these violations by amending Conservative Solutions PAC's disclosures to identify and make public the source(s) of the contribution to the PAC. In addition, respondents request that the FEC impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution.

  
ON BEHALF OF COMPLAINANTS

Noah Bookbinder  
Executive Director  
Citizens for Responsibility and Ethics in  
Washington  
455 Massachusetts Ave. N.W., Sixth Floor  
Washington, D.C. 20001  
(202) 408-5565 (phone)  
(202) 588-5020 (fax)

VERIFICATION

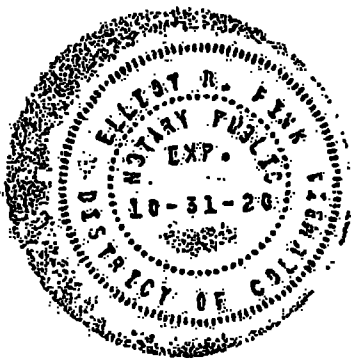
Citizens for Responsibility and Ethics in Washington and Noah Bookbinder verify that the statements made in the attached Complaint are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

  
\_\_\_\_\_  
Noah Bookbinder

Sworn to and subscribed before me this 19th day of February 2016.

  
\_\_\_\_\_  
Notary Public

Commission Expires: 10/31/2020





100-444170-8

**EXHIBIT A**

## Department of State: Division of Corporations

[Allowable Characters](#)[Frequently Asked Questions](#) [View Search Results](#)

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## INFORMATION

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## Entity Details

## THIS IS NOT A STATEMENT OF GOOD STANDING

<u>File Number:</u>	6748471	<u>Incorporation Date:</u>	5/13/2015
		<u>Formation Date:</u>	(mm/dd/yyyy)
<u>Entity Name:</u>	IGX LLC		
<u>Entity Kind:</u>	Limited Liability Company	<u>Entity Type:</u>	General
<u>Residency:</u>	Domestic	<u>State:</u>	DELAWARE

## REGISTERED AGENT INFORMATION

<u>Name:</u>	CORPORATION SERVICE COMPANY		
<u>Address:</u>	2711 CENTERVILLE RD SUITE 400		
<u>City:</u>	WILMINGTON	<u>County:</u>	New Castle
<u>State:</u>	DE	<u>Postal Code:</u>	19808
<u>Phone:</u>	302-836-5401		

Additional information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like [Status](#) [Status, Tax & History Information](#) [Submit](#)

[Back to Entity Search](#)

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**EXHIBIT B**



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9 of 29 DOCUMENTS

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The Associated Press

February 3, 2016 Wednesday 6:02 PM GMT

**SECTION:** WASHINGTON DATELINE; Only on AP

**LENGTH:** 888 words

**HEADLINE:** Big bucks, shadowy companies: Election mystery money returns

**BYLINE:** By JACK GILLUM, CHAD DAY and STEPHEN BRAUN, Associated Press

**DATELINE:** WASHINGTON

**BODY:**

WASHINGTON (AP) - Campaign money from shadowy sources is back this presidential election.

At least \$4 million of it is flowing to outside groups helping White House hopefuls, making it difficult to trace who's behind the big bucks. Both parties benefit from money routed through obscure corporations, or from nonprofits that don't have to disclose their donors.

The contributions are a reminder of federal court decisions in recent years, like Citizens United, that loosened prior restrictions in campaign finance laws. That can hide who's really backing candidates - and what favors or influence could be owed should they get elected.

"Just wait until this year," said billionaire Frank VanderSloot of Idaho. The Associated Press determined that two of his obscure businesses gave a combined \$175,000 to a "super" political committee helping Republican presidential candidate Marco Rubio. "We're going to send bucketloads. This was teaspoons."

Meanwhile, Democratic-leaning American Bridge 21st Century reported more than \$1.5 million from its affiliated nonprofit, which doesn't have to name its donors. American Bridge, which said it used the money to pay for shared expenses like rent and staff, was founded by Hillary Clinton supporter David Brock.

The AP counted more than two dozen groups that each gave at least \$50,000 to presidential-aligned super PACs during the last three months of 2015, piecing together property tax documents, public records and millions of digital campaign finance records. At least half of those were unrecognizable names like family trusts, real estate holdings or firms that were far from household brands.

Sheila Krumholz, the executive director of the Center for Responsive Politics, said voters need to know the sources

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Big bucks, shadowy companies: Election mystery money returns The Associated Press February 3, 2016 Wednesday  
6:02 PM GMT

of political money so they can evaluate how candidates will behave in office.

"These public officials may be bringing IOUs with them to Washington," Krumholz said. "Voters need to be able to consider the source and see whether there are hidden motives."

Opaque contributions aren't new: In 2011, a once-mysterious group gave \$1 million to a super PAC supporting then-GOP presidential candidate Mitt Romney. The group was formed by an executive at Romney's old company, and that co-worker ultimately acknowledged he was behind the contribution.

But this time, no White House incumbent likely means more money to go around, especially during a contentious primary season. Much of the super PAC money so far has paid for pricey political ads, among other expenses.

The largest, obfuscated super PAC donation was \$500,000, which came from an unknown "IGX LLC" to the Rubio-aligned Conservative Solutions. The AP discovered the contribution came from self-described investor and IGX owner Andrew Duncan of Brooklyn, New York, whose firm was listed in a prior Rubio donation.

Duncan helped host a Rubio fundraiser last October, and is on Rubio's campaign website as pledging to "buy Marco a plane ticket." At least half of his \$40,000 in donations since 2012 went to Democratic candidates, including a \$2,700 donation last May to Clinton's campaign.

Rubio has said it's important for people to know the source of political money. "I think that as long as people know who is giving you money, and why it is, people can make judgments on why you are doing what you are doing," he said at a September campaign stop in New Hampshire.

Duncan, who said he worked as a technology executive and has invested in several film productions, acknowledged he was the source of the super PAC donation in emails Tuesday to the AP. Duncan, who funds human-rights efforts in China, said he admired Rubio's work on the issue and had used IGX to mask the donation because he was worried about reprisals.

Even frequent contributors whose names appear elsewhere in Federal Election Commission data donated through an alphabet soup of companies.

VanderSloot, who gave under companies like "TMCV #2 LLC," also contributed \$150,000 under his own name to Conservative Solutions. Those contributions have helped the group so far spend \$14.8 million in ads this election, according to political ad-tracker Kantar Media.

TMCV #2 LLC owns a corporate development property in Utah, whose address is shared with the VanderSloot-owned Riverbend Ranch in Idaho Falls, Idaho. And NG Montana LLC, which also contributed \$85,000 to Conservative Solutions, lists the same address in federal records.

In an interview, VanderSloot confirmed he was behind the contributions but said he was not trying to hide the source of the money. He said the super PAC called him in late December requesting more donations and "that's where we had cash at that moment."

A super PAC supporting Republican Ohio Gov. John Kasich also benefited from New York real estate developer Peter S. Kalikow, the former publisher of the New York Post. He gave \$125,000 through HJK LLC, a company registered to Kalikow's firm HJ Kalikow and Co.

Spokesman Martin McLaughlin said HJK is just one way Kalikow chooses to make donations.

"It's not a mystery that Peter Kalikow supports Republican candidates," he said.

—

Associated Press writers Kimberlee Kruesi in Boise, Idaho; Julie Bykowicz in Washington; and Tom Hays in New York contributed to this report.

**Follow on Twitter: Jack Gillum at <https://twitter.com/jackgillum> or Chad Day at <https://twitter.com/ChadSDay>**

**LOAD-DATE:** February 4, 2016

[illegible]

# EXHIBIT C

18044418044

**FEC  
FORM 3P****REPORT OF RECEIPTS  
AND DISBURSEMENTS**BY AN AUTHORIZED COMMITTEE OF A CANDIDATE  
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT

Office Use Only

1. NAME OF COMMITTEE (In full, type or print)

Example: If typing, type over the lines. 12FE4M5

Marco Rubio for President

ADDRESS (number and street)

PO BOX 140420

Check if different  
than previously  
reported, (ACC)

MIAMI

FL

33114

CITY

STATE

ZIP CODE

2. FEC IDENTIFICATION NUMBER

C C00458844

3. THIS REPORT IS FOR Primary or General

4. TYPE OF REPORT (Choose One)

Check here if this is a Termination Report (TER)

Quarterly Reports:Monthly Reports:April 15 (Q1) ☒ October 15 (Q3)

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)

July 15 (Q2) January 31 Year-End Report (YE)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

Thirtieth day report following the General Election

Twelfth day report preceding election

on

on

In the State of

Is this Report an Amendment?

☒

yes no

5. Covering Period

07 01 2015

through

09 30 2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

LISA LISKER

Signature of Treasurer

LISA LISKER

(Electronically Filed)

Date

10 30 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.  
All previous versions of this form are obsolete and should no longer be used.Office  
Use  
Only



# **SCHEDULE A-P** **ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 736 / 4059

<input type="checkbox"/> 16	<input checked="" type="checkbox"/> 17a	<input type="checkbox"/> 17b	<input type="checkbox"/> 17c	<input type="checkbox"/> 17d	<input type="checkbox"/> 18
<input type="checkbox"/> 18a	<input type="checkbox"/> 18b	<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Marco Rubio for President

**A. Full Name (Last, First, Middle Initial)**

MR. JAMES R. DUNATHAN

Mailing Address 18745 HUMMINGBIRD DR

City	State	Zip Code
PENN VALLEY	CA	95946-9692

FEC ID number of contributing federal political committee. C

Name of Employer

SELF-EMPLOYED

Occupation

INSURANCE

Receipt For: 2016

☒ Primary ☐ General  
Other (Specify) ▼

Election Cycle-to-Date ▼

604.00

Transaction ID : SA17.798549

Date of Receipt

07 10 2015

**CONTRIBUTION**

Amount of Each Receipt this Period

75.00

**B. Full Name (Last, First, Middle Initial)**

MR. JAMES R. DUNATHAN

Mailing Address 18745 HUMMINGBIRD DR

City	State	Zip Code
PENN VALLEY	CA	95946-9692

FEC ID number of contributing federal political committee. C

Name of Employer

SELF-EMPLOYED

Occupation

INSURANCE

Receipt For: 2016

☒ Primary ☐ General  
Other (Specify) ▼

Election Cycle-to-Date ▼

604.00

Transaction ID : SA17.827506

Date of Receipt

08 28 2015

**CONTRIBUTION**

Amount of Each Receipt this Period

75.00

**C. Full Name (Last, First, Middle Initial)**

ANDREW DUNCAN

Mailing Address 71 WILLOW STREET

City	State	Zip Code
BROOKLYN	NY	11201-1618

FEC ID number of contributing federal political committee. C

Name of Employer

IGX LLC

Occupation

CEO

Receipt For: 2016

☒ Primary ☐ General  
Other (Specify) ▼

Election Cycle-to-Date ▼

2700.00

Transaction ID : SA17.801580

Date of Receipt

07 21 2015

**CONTRIBUTION**

Amount of Each Receipt this Period

2700.00

Subtotal Of Receipts This Page (optional)

2850.00

Total This Period (last page this line number only)

**EXHIBIT D**

**CONSERVATIVE  
SOLUTIONS PAC**

RECEIVED  
2013 FEB -5 AM 10:45  
FEC MAIL CENTER

February 4, 2013

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Form 1, Statement of Organization—Unlimited Contributions

To Whom It May Concern:

This committee intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.

Respectfully submitted,



Mary K. Baham  
Treasurer

FEC  
FORM 1

STATEMENT OF  
ORGANIZATION

RECEIVED  
2013 FEB -5 AM 10:45

FEC MAIL CENTER

1. NAME OF  
COMMITTEE (in full)

☐

(Check if name  
is changed)

Example: If typing, type  
over the lines.

12FE4M5

Conservative Solutions PAC

ADDRESS (number and street)

1301 Gervais St., Suite 520

☐

(Check if address  
is changed)

Columbia

SC

29201

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

info@conservativesolutionspac.com

☐

(Check if address  
is changed)

COMMITTEE'S WEB PAGE ADDRESS (URL)

conservativesolutionspac.com

☐

(Check if address  
is changed)

2. DATE

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

☒

NEW (N)

OR

☐

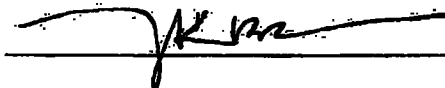
AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Mary K. Baham

Signature of Treasurer



Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
Only

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100

FEC FORM 1  
(Revised 02/2009)

## 5. TYPE OF COMMITTEE

**Candidate Committee:**

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought:

House

Senate

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

**Party Committee:**

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Corporation             | <input type="checkbox"/> Corporation w/o Capital Stock | <input type="checkbox"/> Labor Organization |
| <input type="checkbox"/> Membership Organization | <input type="checkbox"/> Trade Association             | <input type="checkbox"/> Cooperative        |
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

**Joint Fundraising Representative:**

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

**Committees Participating in Joint Fundraiser**

1.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
2.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
3.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
4.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>

13011033373

Write or Type Committee Name

Conservative Solutions PAC

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Mary K. Baham

Mailing Address

1301 Gervais St., Suite 520

Columbia

SC

29201

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

803

315

2383

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name  
of Treasurer

Mary K. Baham

Mailing Address

1301 Gervais St., Suite 520

Columbia

SC

29201

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

803

315

2383

Full Name of  
Designated  
Agent

Mailing Address

CITY

STATE

ZIP CODE

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address

1301 Gervais Street

Columbia

SC

29201

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

1303103375

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**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Conservative Solutions PAC

ADDRESS (number and street)

610 S. Boulevard

Check if different  
than previously  
reported. (ACC)

Tampa

FL

33606

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00541292

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)X January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

In the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the  
State of

5. Covering Period 07 01 2015 through 12 31 2015

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer: Nancy H. Watkins

Signature of Treasurer Nancy H. Watkins

[Electronically Filed]

Date 01 31 2016

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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Detailed Summary PageFOR LINE NUMBER: PAGE 26 OF 107  
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<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

Conservative Solutions PAC

Full Name (Last, First, Middle Initial)

A. IGX, LLC

Mailing Address 2711 Centerville Road  
Suite 400

City	State	Zip Code
Wilmington	DE	19808

FEC ID number of contributing  
federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary      ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500000.00

Date of Receipt

10 26 2015

Transaction ID : SA11AI4521

Amount of Each Receipt this Period

500000.00

Full Name (Last, First, Middle Initial)

B. Mark Johnson

Mailing Address 13831 Windward Circle

City	State	Zip Code
Anchorage	AK	99516

FEC ID number of contributing  
federal political committee.

C

Name of Employer

Chugach Electric Association

Occupation

attorney

Receipt For:

☐ Primary      ☐ General  
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

12 17 2015

Transaction ID : SA11AI4782

Amount of Each Receipt this Period

250.00

Full Name (Last, First, Middle Initial)

C. Louis D. Jorndt

Mailing Address 1038 Cayuga Drive

City	State	Zip Code
Northbrook	IL	60062

FEC ID number of contributing  
federal political committee.

C

Name of Employer

n/a

Occupation

retired

Receipt For:

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☐ Other (specify) ▼

Aggregate Year-to-Date ▼

10000.00

Date of Receipt

12 31 2015

Transaction ID : SA11AI4894

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10000.00

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4 of 12 DOCUMENTS

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February 1, 2016 Monday 4:24 AM GMT

**SECTION:** POLITICAL NEWS

**LENGTH:** 1072 words

**HEADLINE:** Presidential super PACs lost steam in second half of 2015

**BYLINE:** By JULIE BYKOWICZ and CHAD DAY, Associated Press

**DATeline:** WASHINGTON

**BODY:**

WASHINGTON (AP) - Donald Trump has opened his wallet in a big way for his presidential bid. Billionaires are filling the coffers of super political action committees helping Democrat Hillary Clinton and Republican Jeb Bush. And small, online contributions are powering some of the candidates.

Sunday is the first time in six months that the public has gotten a look at super PAC finances. The candidates' official campaigns also have to file new paperwork. They have until midnight.

Here are some findings:

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#### **BIG MONEY WANES**

Many super PACs saw reduced hauls in the second half of the year, compared to the first half. That could be a reflection of the crowded and unusual contest on the Republican side, where frequent poll leader Donald Trump has virtually no outside help while a group backing Bush has spent tens of millions of dollars and seen little payoff for its investment.

Bush's super PAC provided the starkest illustration of the trend.

After locking down a record \$103 million in the first six months of 2015, Right to Rise netted \$15 million in new contributions, most of it thanks to a \$10 million gift from a company belonging to former insurance and finance executive Maurice "Hank" Greenberg. Right to Rise closed the year with more than \$58 million in cash on hand, though it has been spending money at a rapid clip this month, advertising records show.

Presidential super PACs lost steam in second half of 2015 The Associated Press February 1, 2016 Monday 4:24 AM GMT

Between July and the end of December, America Leads, a super PAC for Chris Christie, raised less than half as much as the \$11 million it had collected between January and the end of June. Billionaire hedge-fund manager Steve Cohen and his wife Alexandra gave the group a fresh \$2 million in December, repeating their \$2 million gift to the super PAC in the late spring, the fundraising reports show.

Outside groups supportive of John Kasich landed about \$3.7 in new contributions, compared to the more notable \$11.7 million they'd had harvested for him before June 30. A spokeswoman said January - which is not included in the new reports - has been better. Six donors gave a collective \$4 million in recent weeks, including longtime Kasich booster Greg Wendt, a San Francisco investor.

---

#### THE CLINTON NETWORK

On the flip side, Democrat Hillary Clinton saw a significant jump in outside money late last year. Her campaign is making aggressive use of these groups. A super PAC called Correct the Record works alongside Clinton's campaign, saying it is not running afoul of anti-coordination laws because it isn't spending money on radio or television ads to help her. No other political group is testing that theory.

A second super PAC, Priorities USA, gave Correct the Record \$1 million at the end of the year, new fundraising reports show. Priorities, which raised \$16.7 million by June 30 saw its coffers balloon to \$41.5 million by December.

Its new fundraising report showed 29 donors have given \$20 million - or almost 80 percent of its receipts in the last six months of 2015. Billionaire democratic super donor George Soros topped the super PAC's list with a \$6 million contribution - a follow-up to \$1 million he gave earlier. Media mogul Haim Saban and his wife, Cheryl, gave \$3 million, and financier Donald Sussman gave \$1.5 million.

Seven others donated \$1 million or more, including labor unions such as the International Union of Operating Engineers and the American Federation of Teachers. At the end of the year, the super PAC had \$35 million in cash on hand.

Her Democratic competitor Bernie Sanders picked up \$33 million compared to her \$37 million in official campaign cash from October to December. Sanders continued his dominance with contributors giving \$200 or less; those donations made up some 70 percent of his haul.

---

#### TRUMP LOANS

Trump is in a category all his own. The billionaire businessman loaned his campaign \$10.8 million in the last three months of 2015, after relying mostly on contributors during the fall. The new loans represent a return to his long-touted self-funding plan. As he began his campaign last spring, he loaned it \$1.8 million.

The leader in many Republican preference polls, Trump has promised to spend whatever it takes to secure the party's nomination, sometimes naming \$100 million as a figure. He hasn't had to go deep into his pockets yet, riding a wave of publicity. But he did spend almost \$7 million in the final three months of the year, fundraising reports show.

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#### OBSCURE MONEY

Even when super PAC donors are named, sometimes they're not fully identified.

Presidential super PACs lost steam in second half of 2015 The Associated Press February 1, 2016 Monday 4:24 AM GMT

One example of mystery money surfaced in the donors to Conservative Solutions PAC, a group aligned with Republican candidate Marco Rubio. Overall, Conservative Solutions raised about \$30 million last year, including about \$14 million between July 1 and December 31.

One \$500,000 check was from IGX LLC, which lists an address in Wilmington, Delaware. The trail appears to go cold at that address. According to the Delaware's state corporation registry, IGX LLC was established last May. Corporation Service Company- a company that sets up companies - serves as IGX's registered agent, masking true ownership on state incorporation documents.

#### GOP FUNDRAISING LEADERS

Retired neurosurgeon Ben Carson, the first candidate to file a fundraising report Sunday, is likely to have raised more in the final three months of the year than any of his GOP rivals: \$22.6 million.

Yet that impressive haul is tempered by his overhead: His campaign spent \$27.3 million in the same time period. Put simply, he burned through more cash than he generated.

The report shows Carson's now seemingly longshot campaign is owed almost \$500,000 by the U.S. Secret Service for travel reimbursement. Carson and Trump have had government-funded protection for months, at their request.

Another top money-raiser last year, Ted Cruz, reported collecting \$20.5 million from October to the end of December, a total boosted by \$8.6 million from thousands of donors giving \$200 or less. But Cruz spent considerably less than Carson, about \$15.6 million, and had almost \$19 million in cash when the year began.

Rubio's campaign picked up fundraising steam in the last three months of the year, collecting \$14.2 million, more than doubling his earlier rate. But contrast, Bush's finances were flagging, with his official campaign raising just over \$7 million - roughly half what he'd raised in the earlier quarter.

Associated Press writers Jack Gillum and Jeff Horwitz contributed to this report.

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**EXHIBIT G**



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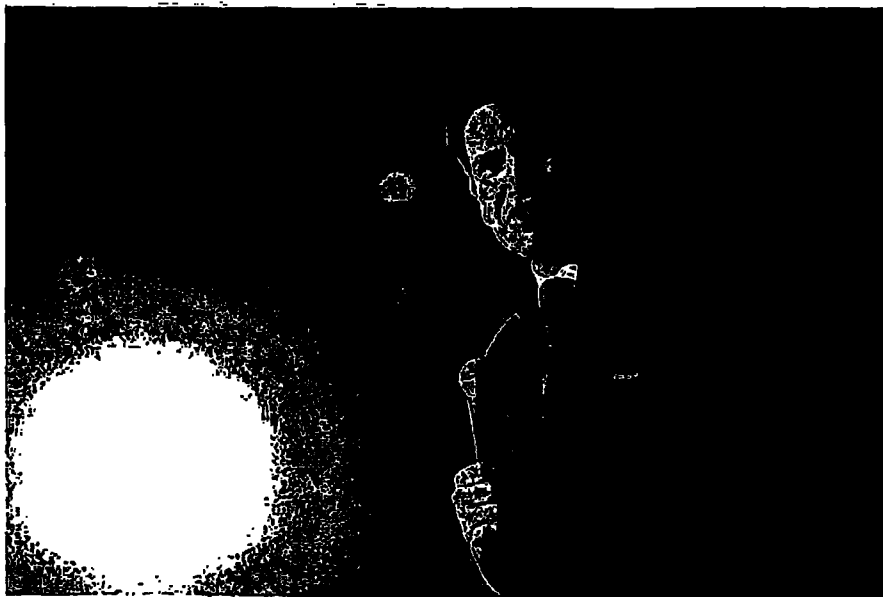
## Hedge Fund Billionaires And Untraceable Money Fill Rubio Super PAC Coeffers

Billionaires Paul Singer and Ken Griffin each gave \$2.5 million.

🕒 01/31/2016 04:51 pm ET

839

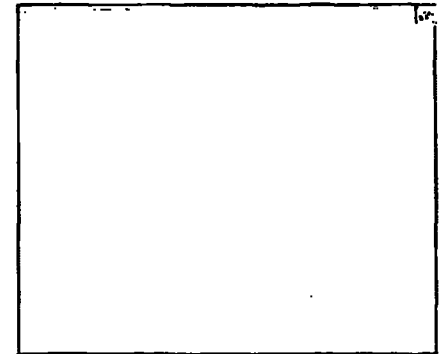
Paul Blumenthal  
Money in Politics Reporter, The Huffington Post



BLOOMBERG VIA GETTY IMAGES

A super PAC supporting Marco Rubio's presidential campaign raised \$14.4 million in the second half of 2015

WASHINGTON -- Super-wealthy hedge fund managers were some of the biggest donors to Conservative Solutions PAC, the super PAC created by allies of Sen. Marco Rubio (R-Fla.) to support his presidential campaign, in a recent filing with the Federal Election Commission.



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The super PAC announced Sunday that it had raised \$14.4 million in the second half of 2015 to take its total to more than \$30 million for the whole year. Billionaire hedge funders Paul Singer and Ken Griffin gave \$2.5 million each. Another hedge fund investor, Cliff Asness, gave \$1 million, as did Miami car dealer and Rubio patron Norman Braman, Florida investor Mary Spencer and wealthy Missouri roofing supply company owner David Humphreys.

Mining entrepreneur Chris Cline and Houston Texans owner Robert McNair each gave \$500,000. Cline previously donated to Jeb Bush's super PAC, Right to Rise USA, through a limited liability company in what appeared to be an attempt to hide his identity. He is now giving openly to Rubio's super PAC.

Another \$500,000 donor, however, remains similarly shrouded in secrecy. IGX LLC gave \$500,000 to Conservative Solutions PAC on Oct. 26, 2015. The address listed for the company is to a separate entity that manages corporate registration in Delaware. According to Delaware state records, IGX LLC was formed May 13, 2015. There is no information identifying any person connected to IGX.

Hedge funders and major super PAC donors Seth Klarman and David Herro also chipped in six-figure donations. Both Klarman and Herro have also given six figures to a super PAC supporting New Jersey Gov. Chris Christie (R). Conservative Solutions PAC has spent millions on advertisements in New Hampshire attacking Christie and his record.

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# **marcorubio**

A NEW AMERICAN CENTURY

Hosted by Ben Heller & Phil Rosen

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Daniel Bartfeld  
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Andrew Duncan  
Liz Feld  
Courtney Geduldig  
Erica & Mark Gerson  
Larry Grafstein

Don Howard  
Andrew Herenstein  
Michael Leffell  
Eric Levine  
Treasurer Josh Mandel  
Brian Morgenstern  
Linda and Chris Ohmacht  
Joe Wall

(Host Committee in Formation)

**Cordially invites you to join**  
**Senator Marco Rubio**

**Wednesday, October 14, 2015**

6:00 -6:30 PM Chairman's Reception  
6:30 -7:00 PM Host / Photo Reception  
7:00 -8:00 PM General Reception

J. Philip Rosen Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

**Host: \$2,700 per person/ \$5,400 for couple**  
**Attendee: \$1,000 per person**

**For questions or to RSVP, please contact Eli Miller**  
**at (978) 621-7722 or [emiller@marcorubio.com](mailto:emiller@marcorubio.com)**

Paid for by Marco Rubio for President

# Marco Rubio for President

Yes! I plan to attend the reception on Wednesday, October 14, 2015.

I am enclosing my contribution of:

- ☐ \$5,400/\$2,700 Host (the most a couple/individual can give in the primary election)  
☐ \$2,000/\$1,000 General Attendee  
☐ Other \_\_\_\_\_  
☐ No, I can't attend but enclosed please find my contribution of: \$ \_\_\_\_\_

Please make check payable to "Marco Rubio for President"

Please mail check to:

Marco Rubio For President  
Attn: Eli Miller  
501 C Street NE  
Washington, DC 20002

## Payment Method:

- ☐ Check enclosed made payable to Marco Rubio for President  
☐ Charge my: ☐ Visa ☐ MasterCard ☐ American Express ☐ Discover

Name as it Appears on Card: \_\_\_\_\_

Credit Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_/\_\_\_\_ "V" Code (3-digit security code): \_\_\_\_\_

Signature: \_\_\_\_\_

Amount of Gift: \$ \_\_\_\_\_

Federal law requires us to use our best efforts to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in an election cycle.

Name \_\_\_\_\_ Preferred Name/Salutation \_\_\_\_\_

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Occupation \_\_\_\_\_ Employer \_\_\_\_\_

(if joint contribution) (if joint contribution)

Phone (w) \_\_\_\_\_ (h) \_\_\_\_\_ (c) \_\_\_\_\_

By signing below, I/we represent that this contribution is drawn from my/our personal funds and not from an account or credit card maintained by any other person or entity.

Signature \_\_\_\_\_ Signature \_\_\_\_\_ (if joint contribution)

Contributions to Marco Rubio for President are not deductible as charitable contributions for federal income tax purposes. Individuals may contribute up to \$2,700 for the Primary election. A couple may contribute up to \$5,400 for the Primary election if drawn on a joint account (both names are listed on the account) and if this form is completed and signed by both contributors. Contributions to Marco Rubio for President are subject to federal contribution limits. Contributions from corporations, labor unions, foreign nationals who are not lawfully admitted for permanent residence, and federal government contractors are not permitted. All contributions must be made from personal funds and may not be reimbursed by any other person.

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**Invest in our campaign by becoming an official sponsor.**

### **Buy Marco a Plane Ticket**

**Click here to buy Marco a Plane Ticket.**

Oscar Camacho - Newfield, NJ  
Peter Johnston - Broussard, LA

### **Adopt a Staffer for the Day**

**Click here to Adopt a Staffer.**

James Emling - Pewaukee, WI  
Kathleen Gibbons - Avon Lake, OH  
Catherine C Light - Bend, OR

Andy Zipay - Baltimore, MD  
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